



WQCD Clean Water Fee Structure Feedback Summary Commerce and Industry

This is an overview of feedback received for the commerce and industry workgroup. A similar summary will be published for each workgroup based on individual and group submissions. Comments and levels of agreement for large group policy considerations including statute vs. commission, general fund and the overall process will be shared in a separate full group summary.

RESPONDENT SUMMARY

Total number of respondents: **10**

See table below for summary.

Respondents who attended meetings: **90%**

Respondent types

Stakeholder Group	Approximate Number of Permits	Number of Respondents
Trade associations	n/a	3
Sector permittees	3000	6
Non-governmental organization	n/a	1

The commerce and industry workgroup discussed a proposed scaled fee schedule current or increased services. The proposed structure 12 categories to 1, and 59 sub-categories to 7. Categories replaced include 1-4, 7-10, 11, 12, 24, 26 and the 59 associated subcategories.

Cat./ Sub-cat.	Category Description	No. of Entities	Scenario 1		Scenario 2		Scenario 3	
			<i>with increased services</i>	<i>without increased services</i>	<i>with increased services</i>	<i>without increased services</i>	<i>with increased services</i>	<i>without increased services</i>
07-01	Individual Permits - Low complexity	32	\$3,650	\$3,480	\$4,800	\$4,650	\$3,000	\$2,760
07-02	Individual Permits - medium complexity	22	\$5,900	\$5,630	\$7,800	\$7,560	\$4,800	\$4,420
07-03	Individual Permits - high complexity	48	\$8,100	\$7,730	\$10,750	\$10,430	\$6,700	\$6,160
07-04	Individual Permits - very high complexity	11	\$11,100	\$10,600	\$14,700	\$14,260	\$9,100	\$8,365
07-05	General Permits - low complexity	1,767	\$360	\$160	\$480	\$280	\$300	\$100
07-06	General Permits - medium complexity	175	\$900	\$700	\$1,200	\$1,000	\$750	\$550
07-07	General Permits - high complexity	35	\$3,500	\$3,430	\$4,650	\$4,500	\$2,900	\$2,630

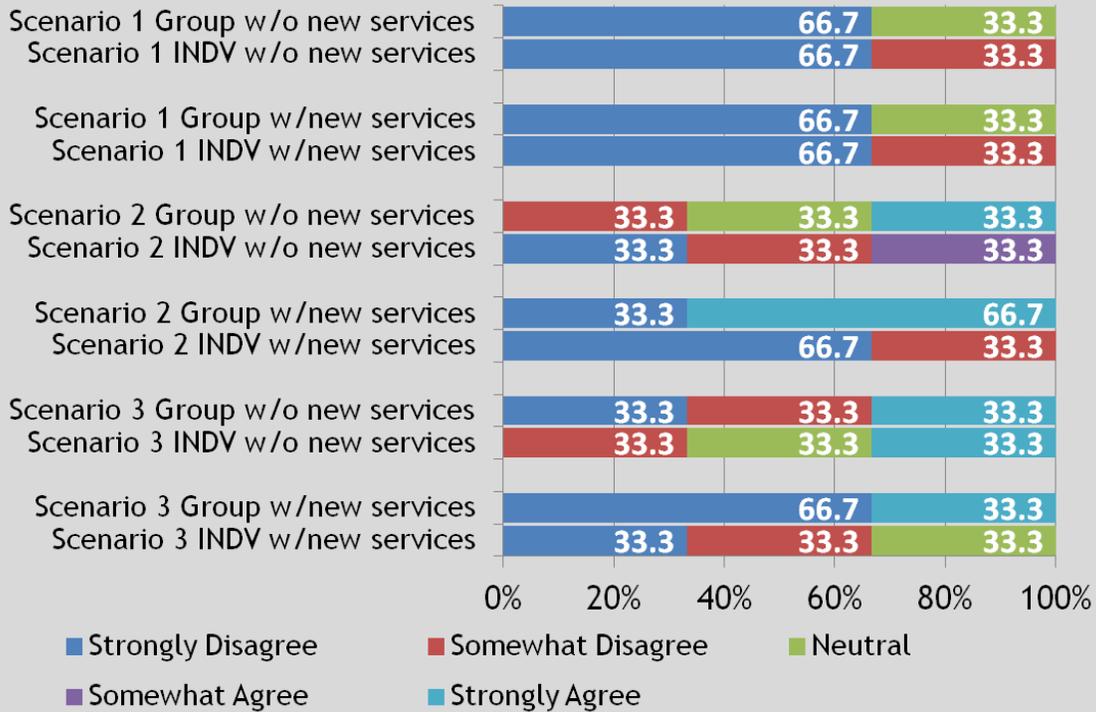
(6 of 10 respondents) • 3 respondents indicated agreement with at least one of the scenarios.

- 3 respondents indicated a preference regarding new services
 - ◊ 1 indicated a preference for new services.
 - ◊ 2 indicated a preference for no new services.
- 3 did not indicate a preference regarding new services (i.e. they rated scenarios with and without new services the same).
 - 4 respondents indicated a preference among scenarios.
 - ◊ 3 respondents indicated a preference for scenario 3.
 - ◊ 1 indicated a preference for scenario 2.
 - ◊ 2 did not indicate a preference among scenarios.



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Level of agreement (%) on fee scenarios (n INDV=3 n GROUP=4)



Compliance oversight - current and increased services

Number of permits	Master General Permit Name	Current monitoring level	Monitoring goal* - with increased
109	Subterranean dewatering or well development:	0%	10%
104	Commercial washing of outdoor structures:	0%	10%
964	Non-extractive industries stormwater:	2%	10%
92	Metal mining industry stormwater:	2%	10%
498	Sand & gravel mining and processing stormwater only:	2%	10%
162	Sand & gravel mining wastewater and stormwater combined:	2%	20%
13	Aquatic animal production:	3%	20%
11	Coal mining process water and stormwater combined:	20%	20%
14	Non-contact cooling water:	8%	20%
10	Produced water treatment facilities:	20%	20%

(6 of 10 respondents)

Do you support the monitoring goals recommended by EPA and described in the above table?

- ◇ 2 indicated agreement.
- ◇ 1 indicated disagreement.
- ◇ 3 were neutral.



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Discharge permit applications, application supplements and permit modifications

(7 of 10 respondents)

- Applications:
 - ◇ 2 indicated agreement with the proposed fees.
 - ◇ 3 indicated disagreement.
 - ◇ 2 were neutral.
- Modifications:
 - ◇ 3 indicated agreement with the proposed fees.
 - ◇ 2 indicated disagreement.
 - ◇ 2 were neutral.

Two respondents indicated that more detail should be provided on what constitutes a major vs. minor permit amendment.

A la carte (7 of 10 respondents completed all or part of this section)

Service Type	Application Fee
Compliance assistance	Fee based on hourly rates.
Administrative action	\$80
Low complexity	\$600
Low/medium complexity	\$1,100
Medium complexity	\$3,800
High to very high complexity	\$3,800 submitted with application, additional hourly rate fees may apply.

- Compliance assistance:
 - ◇ 2 indicated agreement with the proposed fee.
 - ◇ 2 indicated disagreement.
 - ◇ 3 were neutral.
- Administrative action and Low complexity:
 - ◇ 4 indicated agreement with the proposed fee.
 - ◇ 1 indicated disagreement.
 - ◇ 1 was neutral.
- Low/medium and medium complexity:
 - ◇ 3 indicated agreement with the proposed fee.
 - ◇ 1 indicated disagreement.
 - ◇ 2 were neutral.
- High to very high complexity:
 - ◇ 2 indicated agreement with the proposed fee.
 - ◇ 2 indicated disagreement.
 - ◇ 2 were neutral.

* This sector had the most disagreement with the compliance assistance a la carte fee proposal. In other sectors, a majority agreed with the proposed fee.



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Workgroup Recommendations

Each workgroup created a set of recommendations. Below is a summary on the average level of agreement (or disagreement) with each of the recommendations.

Recommendation (7 of 10 respondents)	Outcome
1. Request that division identify trends in non-compliance within sectors and create a compliance assistance model.	3 indicated agreement, 2 indicated disagreement, 2 were neutral.
2. Create a frequently asked question section on the division website, organized by topic, that includes a string on questions with division responses.	6 indicated agreement, 1 indicated disagreement.
3. Permit renewal recommendations for commerce and industry sector:	
a. Provide education on the permit renewal process for this sector.	4 indicated agreement, 1 indicated disagreement, 2 were neutral.
b. Provide education on the drivers of change during permit renewals.	5 indicated agreement, 1 indicated disagreement, 1 was neutral.

Level of agreement (%) on workgroup recommendations (n INDV=3 n GROUP=4)

